

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

LET EXPERIENCED PILOTS)	
FLY, INC.,)	
)	
)	
Plaintiff,)	Case No. 1:24-cv-0736
)	
v.)	Honorable Franklin U. Valderrama
)	
AIR LINE PILOTS ASSOCIATION,)	
INTERNATIONAL,)	
)	
Defendant.)	
_____)	

**JOINT MOTION TO EXTEND DEADLINE
FOR JOINT INITIAL STATUS REPORT**

Defendant Air Line Pilots Association, International (“ALPA”) and Plaintiff Let Experienced Pilots Fly, Inc. (“LEPF”) respectfully request that the Court extend the deadline to file the joint initial status report, which is due by April 10, 2024, until after a ruling on Defendant’s pending Motion to Dismiss Plaintiff’s First Amended Complaint (DE #24). In support of this Motion, the Parties state the following:

1. On January 27, 2024, Plaintiff filed its initial Complaint. DE #1.
2. On January 30, 2024, the Court ordered the Parties to file a joint initial status report on or before April 10. DE #11.
3. On February 15, 2024, Defendant filed its Motion to Dismiss Plaintiff’s initial Complaint. DE #14. Plaintiff filed its First Amended Complaint on March 8, 2024 (DE #21), and on March 12, the Court terminated that motion to dismiss as moot (DE #23).
4. On March 20, 2024, Defendant filed its Motion to Dismiss Plaintiff’s First Amended Complaint. DE #24. On March 21, the Court ordered Plaintiff to respond to the pending Motion to Dismiss by April 10 and Defendant to reply by April 24, 2024. DE #25.

5. The initial joint status report and Plaintiff's response to the pending Motion to Dismiss are both due by April 10. *See* DE #11, DE #25.

6. Defendant's position is that delaying the initial joint status report until after the Court has resolved the dispositive legal issues raised in Defendant's pending Motion to Dismiss would avoid potentially unnecessary costs and legal fees as well as, in the Defendant's view, conserve judicial resources. Plaintiff's position is that Defendant's Motion to Dismiss is without merit. In any event, granting such a delay would not prejudice either of the Parties.

7. Moreover, if the Court denies Defendant's pending Motion to Dismiss, granting the requested extension would allow the Parties to provide more comprehensive information to the Court in the initial joint status report as to the legal issues and would allow the Parties to better anticipate the expected length and scope of further proceedings.

Wherefore, the Parties respectfully request that the Court extend the deadline for the initial joint status report until after ruling on the pending Motion to Dismiss Plaintiff's First Amended Complaint.

Dated: March 29, 2024

Respectfully submitted,

Marcus C. Migliore (*Bar No. 411674*)
Thomas N. Ciantra (*Bar No. 2370161*)
Antonia Bird (*Bar No. 171213004*)
AIR LINE PILOTS ASSOCIATION,
INTERNATIONAL
Legal Department
7950 Jones Branch Drive, Suite 400S
McLean, VA 22102
Tel.: (202) 797-4054
Fax: (703) 481-2478
Marcus.Migliore@alpa.org
Thomas.Ciantra@alpa.org
Antonia.Bird@alpa.org

/s/ Barry M. Bennett

Barry M. Bennett
DOWD, BLOCH, BENNETT, CERVONE,
AUERBACH & YOKICH LLP
8 South Michigan Avenue, 19th Floor
Chicago, IL 60603
Tel.: (312) 372-1361
Fax: (312) 372-6599
bbennett@laboradvocates.com

Attorneys for Defendant Air Line Pilots Association, International

Peter A. Gaido, Esq. (ARDC 6201144)
Ronald L. Sandack, Esq. (ARDC 6203280)
Justin C. Kanter, Esq. (ARDC 6303651)
Gaido & Fintzen
30 N. LaSalle Street, Suite 2727
Chicago, IL 60602
T: (312) 346-7855
F: (312) 346-8317
peter@gaido-fintzen.com
ronald@gaido-fintzen.com
jkanter@gaido-fintzen.com

/s/ Daniel J. Becka

Daniel J. Becka (ARDC 6202427)
Law Offices of Daniel J. Becka, LLC
30 N. LaSalle Street, Suite 2727
Chicago, IL 60602
T: (312) 646-1092
F: (312) 278-2455
dan@dbeckalaw.com

Attorneys for Plaintiff Let Experienced Pilots Fly, Incorporated

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2024, I will file the above Joint Motion to Extend Deadline of the Joint Initial Status Report with the Clerk of the United States District Court for the Northern District of Illinois, using the electronic case filing system which, based on current records, will result in service on the following:

Daniel J. Becka
Law Office of Daniel J. Becka, LLC
30 N. LaSalle Street, Suite 2727
Chicago, IL 60202

Peter A. Gaido, Esq.
Ronald L. Sandack, Esq.
Justin C. Kanter, Esq.
Gaido & Fintzen
30 N. LaSalle Street, Suite 2727
Chicago, IL 60602

/s/ Barry M Bennett

Barry M. Bennett